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TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

December 5, 2011

TO: Internal File

THRU: Steve Christensen, Team Lead *SC*

FROM: Priscilla W. Burton, CPSSc, Environmental Scientist III *pwb m sos*

RE: Waste Analysis Lab Data, Canyon Fuel Company, Dugout Canyon Mine,
C/007/0039, Task ID #3952

SUMMARY:

Supplemental information for Attachment 5-4 of the Dugout Mine MRP was received on November 18, 2011. The information in this application includes the analyses of 31 waste rock samples pulled from April 30 to September 1, 2011. Fifty nine samples were analyzed in 2010. Including the analyses already included in Attachment 5-4, there have been 48 samples analyzed to date in 2011.

The plan indicates that one grab sample will be taken for every 5,000 yd³ hauled to the waste rock site (Chap. 5, Sec. 513.400, Sec. 528.300, Sec. 536 and Refuse Pile Amendment Volume Section 536.200). Using the conversion factor of 110 lbs/ft³ (described in RA Attachment 5-3), the 59 samples would represent approximately 438,075 tons that were placed in the waste rock site in 2010. [(59 samples x 5,000 yd³ x 27 ft³ per yard x 110 lbs/ft³) / 2,000 lb/ton]

Similar calculations indicate that 356,400 tons were placed in the waste rock site through September 2011. The February 2010 certification (December 2009 inspection) indicated that the remaining capacity of the waste rock site was 724,222 tons. The waste rock site has likely reached capacity.

For the most part, these analyses reflect non-acidic, non-toxic waste.

The information should be approved and incorporated into the MRP.